



ESHS/OHS/GB V/VAC Company Code of Conduct and Action Plan

cocap1113

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COMPANY CODE OF CONDUCT IMPLEMENTING ESHS & OHS STANDARDS PREVENTING GENDER BASED VIOLENCE AGAINST CHILDREN

The company is committed to ensuring that the project is implemented in such a way which minimizes any negative impacts on the local environment, communities, and its workers. This will be done by respecting the environmental, social, health and safety (ESHS) standards, and ensuring appropriate occupational health and safety (OHS) standards are met. The company is also committed to creating and maintaining an environment in which gender based violence (GBV) and violence against children (VAC) have no place, and where they will not be tolerated by any employee, sub-contractors, supplier, associate, or representative of the company.

Therefore, to ensure that all those engaged in the project are aware of this commitment, the company commits to the following core principles and minimum standards of behavior that will apply to all company employees, associates, and representatives, including sub-contractors and suppliers, without exception:

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General

1. The company-and therefore all employees, associates, representatives, sub-contractors and suppliers-commits to complying with all relevant national laws, rules and regulations.
2. The company commits to fully implementing its 'Contractors Environmental and Social Management Plan' (CESMP).
3. The company commits to treating women, children (persons under the age of 18), and men with respect regardless of race, color, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status. Acts of GBV and VAC are in violation of this commitment.
4. The company shall ensure that interactions with local community members are done with respect and non-discrimination.
5. Demeaning, threatening, harassing, abusive, culturally inappropriate, or sexually provocative language and behavior are prohibited among all company employees, associates, and its representatives, including sub-contractors and suppliers.
6. The company will follow all reasonable work instructions (including regarding environmental and social norms).
7. The company will protect and ensure proper use of property (for example, to prohibit theft, carelessness or waste).

Health and Safety

8. The company will ensure that the project's occupational health and safety (OHS) Management Plan is effectively implemented by company staff, as well as sub-contractors and suppliers.
9. The company will ensure that all persons on-site wear prescribed and appropriate personal protective equipment, preventing avoidable accidents and reporting conditions or practices that pose a safety hazard or threaten the environment.

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10. The company will:

- i. prohibit the use of alcohol during work activities.
- ii. prohibit the use of narcotics or other substances which can impair faculties at all times.

11. The company will ensure that adequate sanitation facilities are available on site and at any worker accommodations provided to those working on the project.

12. Acts of GBV or VAC constitute gross misconduct and are therefore grounds for sanctions, which may include penalties and/or termination of employment, and if appropriate referral to the Police for further action.

13. All forms of GBV and VAC, including grooming are unacceptable, regardless of whether they take place on the work site, the work site surroundings, at worker's camps or within the local community.

i. Sexual Harassment-for instance, making unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct, of a sexual nature, including subtle acts of such behavior is prohibited.

ii. Sexual favors -for instance, making promises or favorable treatment dependent on sexual acts-or other forms of humiliating, degrading or exploitative behavior are prohibited.

14. Sexual contact or activity with children under 18 - including through digital media - is prohibited. Mistaken belief regarding the age of a child is not a defense. Consent from the child is also not a defense or excuse.

15. Unless there is full consent' by all parties involved in the sexual act, sexual interactions between the company's employees (at any level) and members of the communities surrounding the work place are prohibited. This includes relationships involving the withholding/promise of actual provision of benefit (monetary or non-monetary) to community members in exchange for sex-such sexual activity is considered "non-consensual" within the scope of this Code.

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16. In addition to company sanctions, legal prosecution of those who commit acts of GBV or VAC will be pursued if appropriate.

17. All employees, including volunteers and sub-contractors are highly encouraged to report suspected or actual acts of GBV and/or VAC by a fellow worker, whether in the same company or not. Reports must be made in accordance with project's GBV and VAC Allegation Procedures.

18. Managers are required to report and act to address suspected or actual acts of GBV and/or VAC as they have a responsibility to uphold company commitments and hold their direct reports responsible.

Implementation

To ensure that the above principles are implemented effectively the company commits to ensuring that:

19. All managers sign the project's 'Manager's Code of Conduct' detailing their responsibilities for implementing the company's commitments and enforcing the responsibilities in the 'Individual Code of Conduct'.

Consent is defined as the informed choice underlying an individual's free and voluntary intention, acceptance or agreement to do something. No consent can be found when such acceptance or agreement is obtained using threats, force or other forms of coercion, abduction, fraud, deception, or misrepresentation. In accordance with the United Nations Convention on the Rights of the Child, the World Bank considers that consent cannot be given by children under the age of 18, even if national legislation of the country into which the Code of Conduct is introduced has a lower age.

Mistaken belief regarding the age of the child and consent from the child is not a defense.

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20. All employees sign the project's individual Code of Conduct' confirming their agreement to comply with ESHS and OHS standards, and not to engage in activities resulting in GBV or VAC.
21. Displaying the Company and Individual Codes of Conduct prominently and in clear view at workers' camps, offices, and in public areas of the work space. Examples of areas include waiting, rest and lobby areas of sites, canteen areas and health clinics.
22. Ensure that posted and distributed copies of the Company and Individual Codes of Conduct are translated into the appropriate language of use in the work site areas as well as for any international staff in their native language.
23. An appropriate person is nominated as the company's 'Focal Point' for addressing GBV and VAC issues, including representing the company on the GBV and VAC Compliance Team (GCCT) which is comprised of representatives from the client, contractor(s), the supervision consultant, and local service provider(s).
24. Ensuring that an effective GBV and VAC Action Plan is developed in consultation with the GCCT which includes as a minimum:
 - i. GBV and VAC Allegation Procedure to report GBV and VAC issues through the project Grievance Redress Mechanism (Section 4.3 Action Plan);
 - ii. Accountability Measures to protect confidentiality of all involved (Section 4.4 Action Plan);
And,
 - iii. Response Protocol applicable to GBV and VAC survivors and perpetrators (Section 4.7 Action Plan).
25. That the company effectively implements the agreed final GBV and VAC Action Plan, providing feedback to the GCCT for improvements and updates as appropriate.
26. All employees attend an induction training course prior to commencing work on site to ensure they are familiar with the company's commitments to ESHS and OHS standards, and the project's GBV and VAC Codes of Conduct.

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27. All employees attend a mandatory training course once a month for the duration of the contract starting from the first induction training prior to commencement of work to reinforce the understanding of the project's ESHS and OHS standards and the GBV and VAC Code of Conduct.

I do hereby acknowledge that I have read the foregoing Company Code of Conduct, and on behalf of the company agree to comply with the standards contained therein. I understand my role and responsibilities to support the project's OHS and ESHS standards, and to prevent and respond to GBV and VAC. I understand that any action inconsistent with this Company Code of Conduct or failure to act mandated by this Company Code of Conduct may result in disciplinary action. I have hereunto set my hand and caused to be affixed the Imperial Seal of The Ethiopian World Federation, Inc. New York, NY.

Signature_____

Printed Name_____

Title_____

Date_____